

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

JACQUELINE STEVENS,)	
)	
Plaintiff,)	
)	
v.)	No. 18 C 5391
)	
BROADCASTING BOARD OF)	Judge Rowland
GOVERNORS, <i>et al.</i> ,)	
)	
Defendants.)	

L.R. 56.1 STATEMENT OF ADDITIONAL FACTS
IN SUPPORT OF DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

Defendants, by John R. Lausch, Jr., United States Attorney for the Northern District of Illinois, submit the following statement of additional material facts as to which there is no genuine issue pursuant to Local Rule 56.1 of the United States District Court for the Northern District of Illinois and the court's order allowing twelve additional statements of fact. Dkt. 65.

Agency Declarations

81. The declarants for BBG, HHS, USCIS, USGS, USAID, and ICE all signed their declarations under penalty of perjury and stated that the information in their declarations is true to the best of their knowledge and belief. Ex. A at 1 and 3, Ex. B at 4, Ex. C at 1 and 8, Ex. D at 11, Ex. E at 9, Ex. F at 117 of 128.

USCIS

82. USCIS searched all files likely to contain responsive records. Ex. C ¶¶ 13 ("all files likely to contain responsive records were searched"), 16 ("all files likely to contain responsive material were searched").

USAID

83. USAID's bureaus and independent offices have, within their structure, sub-offices such as an Office of the Assistant Administrator, Office of Strategic Planning Operations, Office of Technical Support, and Administrative Management Services. Ex. H (Colbow Decl.) ¶¶ 3-4. Those offices do not exist as standalone entities. *Id.* ¶ 5.

84. When a bureau or independent office is searched for documents responsive to a FOIA request, the sub-offices are encompassed by the search. *Id.* ¶ 6.

85. Every staff member in USAID's Mission in West Bank and Gaza was tasked with searching for the term "Northwestern" in their Gmail, Desktop, "My Documents" folder, local drive, and shared drives. *Id.* ¶¶ 8-9.

86. USAID's Bureau for Asia searched its accounting system and shared drives using the search term "northwestern" and returned no responsive records. *Id.* ¶¶ 12-14.

ICE

87. ICE's Office of Enforcement and Removal Operations, Office of Acquisition Management, and Office of the Principal Legal Advisor are among the offices that maintain ICE records. Ex. F ¶ 14 ("ICE records are maintained by leadership offices and/or within ICE directorates, including but not limited to, the Office of Enforcement and Removal Operations, the Office of Acquisition Management, and the Office of the Principal Legal Advisor.").

HHS

88. HHS tasked its IT department to search for emails: (1) sent to or received by HHS's refugee resettlement office's Federal Field Specialists or their supervisors; (2) that included an ICE email address, a CBP email address, or "senn@uthscsa.edu"; and (3) that included terms relating to age assessments. Ex. B ¶ 14.

89. The search encompassed January 1, 2016 to December 6, 2018, and the results were returned to HHS's declarant on December 13, 2018. Ex. B ¶ 14 ("The search request included emails between January 1, 2016 and December 6, 2018. I received the results of the search on December 13, 2018.").

No Challenge to Agencies' Withholdings

90. Stevens asked the court for leave in December 2019 to file a motion to compel regarding what in her view were deficiencies in the agencies' productions and redactions. Ex. I (December 2019 hearing) at 3 (seeking leave to "file a motion to compel to address the deficiencies in productions and the redactions").

91. The parties reported to the court the next month that Stevens would be filing a motion to compel regarding whatever remaining issues she had with the agencies' productions, including "some search adequacy objections" and "possible redaction issues." Ex. J (January 2020 hearing) at 2.

92. The court has expressed its desire not to engage in multiple rounds of briefing to resolve this case. Ex. J at 3 (Mr. Kolluri: "The last thing the government would want is multiple rounds of briefing" The Court: "No, we're not doing that.").

Respectfully submitted,

JOHN R. LAUSCH, Jr.
United States Attorney

By: s/ Alex Hartzler
ALEX HARTZLER
Assistant United States Attorney
219 South Dearborn Street
Chicago, Illinois 60604
(312) 886-1390
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
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JACQUELINE STEVENS,)
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**INDEX OF EXHIBITS TO DEFENDANTS'
RULE 56.1 STATEMENT OF ADDITIONAL FACTS**

Exhibit G	April 23, 2020 email ¹
Exhibit H	Supplemental Declaration of Christopher A. Colbow
Exhibit I	December 2, 2019 Hearing Transcript
Exhibit J	January 30, 2020 Hearing Transcript

Respectfully submitted,

JOHN R. LAUSCH, Jr.
United States Attorney

By: s/ Alex Hartzler
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219 South Dearborn Street
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¹ Inadvertently omitted from Dkt. 56 and included here for completeness of the record. Also included by plaintiff at Dkt. 59-2, Ex. R-4.

Exhibit G

From: Nicolette Glazer <nicolette@glazerandglazer.com>
Sent: Thursday, April 23, 2020 6:49 PM
To: Hartzler, Alex (USAILN)
Cc: Kolluri, Prashant (USAILN)
Subject: RE: Stevens v. BBG - 17 C 2853

Hi Alex,

It was a pleasure talking to you today. Yes, the motion to compel we filed does not challenge any redaction/exemptions applied.

Nicolette Glazer Esq.

Certified Specialist in Immigration and Nationality Law
State Bar of California, Board of Legal Specialization

Direct Line: (310) 735-3478

Law Offices of Larry R Glazer

Main office: 1875 Century Park East, 7th Floor, Century City, CA 90067
Support Office: 79125 Corporate Center Dr. #6351, La Quinta, CA 92253
www.GlazerandGlazer.com / Tel: (310) 407-5353 / Fax: (310) 407-5354

****Please send all documents in paper format and payments to our La Quinta office at the address below ****

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Circular 230 Disclosure: Any tax advice provided in this communication is not intended or written to be used, and it cannot be used by the recipient or any other taxpayer (i) for the purpose of avoiding tax penalties that may be imposed, or (ii) in promoting, marketing, or recommending tax transaction or matter to another party. Please seek advice from an independent tax advisor with respect to any tax transaction or matter contained herein.

From: Hartzler, Alex (USAILN) <Alex.Hartzler@usdoj.gov>
Sent: Thursday, April 23, 2020 8:24 AM
To: Nicolette Glazer <nicolette@glazerandglazer.com>
Cc: Kolluri, Prashant (USAILN) <Prashant.Kolluri@usdoj.gov>
Subject: RE: Stevens v. BBG - 17 C 2853

Nicolette,

Thanks for the call this morning. Just confirming our understanding from the call that exemptions and redactions are not at issue in this case, and what is at issue per the motion are adequacy-of-the-search issues.

Thanks,
Alex

From: Hartzler, Alex (USAILN)
Sent: Monday, April 20, 2020 11:39 AM
To: Nicolette Glazer <nicolette@glazerandglazer.com>
Cc: Kolluri, Prashant (USAILN) <PKolluri@usa.doj.gov>
Subject: RE: Stevens v. BBG - 17 C 2853

Will do. Thanks.

From: Nicolette Glazer <nicolette@glazerandglazer.com>
Sent: Monday, April 20, 2020 11:38 AM
To: Hartzler, Alex (USAILN) <AHartzler@usa.doj.gov>
Subject: RE: Stevens v. BBG - 17 C 2853

10:00 your time is fine. Call me at 310-735-3478.

Nicolette Glazer Esq.

Certified Specialist in Immigration and Nationality Law
State Bar of California, Board of Legal Specialization

Direct Line: (310) 735-3478

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From: Hartzler, Alex (USAILN) <Alex.Hartzler@usdoj.gov>
Sent: Monday, April 20, 2020 9:14 AM
To: Nicolette Glazer <nicolette@glazerandglazer.com>
Cc: Kolluri, Prashant (USAILN) <Prashant.Kolluri@usdoj.gov>
Subject: RE: Stevens v. BBG - 17 C 2853

Great. Is 10am Central too early?

From: Nicolette Glazer <nicolette@glazerandglazer.com>
Sent: Monday, April 20, 2020 11:12 AM
To: Hartzler, Alex (USAILN) <AHartzler@usa.doj.gov>
Cc: Kolluri, Prashant (USAILN) <PKolluri@usa.doj.gov>
Subject: RE: Stevens v. BBG - 17 C 2853

Hi there,

Thursday the 23rd works fine for me. What time is best for you?

Nicolette Glazer Esq.

Certified Specialist in Immigration and Nationality Law
State Bar of California, Board of Legal Specialization

Direct Line: (310) 735-3478

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From: Hartzler, Alex (USAILN) <Alex.Hartzler@usdoj.gov>
Sent: Monday, April 20, 2020 8:59 AM
To: Nicolette Glazer <nicolette@glazerandglazer.com>
Cc: Kolluri, Prashant (USAILN) <Prashant.Kolluri@usdoj.gov>
Subject: Stevens v. BBG - 17 C 2853

Nicolette,

I can't remember if Prashant introduced me as the AUSA coming on board to the Stevens v. BBG et al case, 17 C 2853. Prashant and I would like to speak with you about the briefing schedule that the court has asked the parties to propose by May 4.

Are you free anytime this Thursday?

Thanks,
Alex

Alex Hartzler
Assistant United States Attorney
Northern District of Illinois
219 South Dearborn Street, Fifth Floor
Chicago, Illinois 60604
(312) 886-1390
alex.hartzler@usdoj.gov

Exhibit H

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

JACQUELINE STEVENS,)	
)	
Plaintiff)	
)	
)	No. 1:18cv05391
v.)	
)	Hon. Judge Rowland
BROADCASTING BOARD OF)	
GOVERNORS <i>et al.</i> ,)	
)	
Defendants.)	

SUPPLEMENTAL DECLARATION OF CHRISTOPHER A. COLBOW

I, Christopher A. Colbow, hereby declare pursuant to 28 U.S.C. § 1746 the following as my testimony in the above captioned case:

1. I am the Freedom of Information Act (FOIA) Officer, the FOIA Public Liaison, and the Division Chief of the Bureau for Management, Office of Management Services, Information and Records Division for the United States Agency for International Development (“USAID”). I am a second-line supervisor managing a staff of 5 direct-hires and 5 institutional contractors. I am also the Agency Records Officer, with overall responsibility for implementing and carrying out the agency’s records management program. I assumed these official capacities in April 2019. I work with my staff on the adequacy of searches for information requested through FOIA and on the applicability of FOIA exemptions. I am familiar with the FOIA, its requirements for disclosure and its exemptions from disclosure, and am experienced in judging whether documents are responsive and should be produced in full, redacted or withheld in their entirety. I am also familiar with the Federal Records Act and its dispositioning of agency records authorities for USAID.
2. The purpose of this declaration is to establish certain facts underlying USAID’s response to the Plaintiff’s FOIA request.

USAID Organizational Structure

3. In response to Freedom of Information Act (FOIA) requests, USAID bureaus (B), independent offices (IO), and mission locations conduct searches of relevant sections within its structure that may have records in response to the FOIA requests.

4. The typical B/IO organizational structure generally consists of the Office of the Assistant Administrator, Office of Strategic Planning Operations, Office of Technical Support, and Administrative Management Services.
5. Contrary to Ms. Stevens assertions, the Offices of the Assistant Administrator, Strategic Planning Operations, Technical Support, and Administrative Management Services are not standalone entities.
6. Where a B/IO is searched, all of the aforementioned offices are considered encompassed by the search, as it is implicit in every search that the B/IO searched where it is reasonably expected to find documents.
7. At mission locations the organizational structure ordinarily consists of the Office of the Director, Executive Office, Technical Office, Program Office, and Financial Management Office. Where a mission is searched, all of the aforementioned offices are considered encompassed by the search, as it is implicit in every search that the mission searched where it is reasonably expected to find documents.

USAID Mission in West Bank and Gaza

8. On November 23, 2015, the entire USAID West Bank Gaza staff was emailed regarding Ms. Stevens's FOIA request in an email titled: "Action required by all – FOIA request relating to Northwestern University."
9. The email specifically included instructions on how individuals were to search using the term "Northwestern" in Gmail, as well as in their Desktop, My Documents folder, local drive, and multiple share drives.
10. With respect to the search of the USAID Mission in West Bank and Gaza, between November 23, 2015 and December 3, 2015, thirty-nine responses were provided on behalf of the individuals and/or their colleagues that searches had been completed. The titles of some of those individuals whose records were searched included:
 - a. Projects Activity Manager
 - b. AID, Project Management Specialist (Construction) WRI, Water Resources & Infrastructure Office
 - c. Project Management Specialist, Education Development Office
 - d. Supervisory Administrative Logistics Liaison
 - e. Senior Projects Manager, Water Resources & Infrastructure Office
 - f. Procurement Agent
 - g. Communications & Records Management Supervisor
 - h. Senior Technical & Policy Advisor
 - i. Human Resources Assistant
 - j. Accountant
 - k. Acting Director, Education Development Office
 - l. Telephone Operator, EXO Clerk

- m. Senior Program Advisor
 - n. Travel Assistant
 - o. Deputy Controller
 - p. Contracts and Agreements Officer
 - q. Supervisory Voucher Examiner
 - r. Deputy Director
 - s. Rule of Law Specialist
 - t. Human Resources Specialist
 - u. As well as individuals in the:
 - i. Water Resources & Infrastructure Office
 - ii. Private Enterprise Office
11. The aforementioned Communications & Records Management Supervisor specifically stated that she searched the archive of the Mission and found “no documents in archive or on hand relating to Northwestern University.”

Bureau for Asia

12. In my previous declaration, I stated that: “On March 13, 2019, the FOIA Liaison Officer for the Bureau for Asia, confirmed a search of the Bureau’s accounting system and shared drives resulted in a no records response.” It has since come to my attention that the statement was incorrect.
13. The correct statement should read that there were no responsive records. As the search conducted of the Bureau for Asia shared drives resulted in 47 non-responsive records.
14. Based on my review of those non-responsive records, it is evident that the search term “northwestern” was used to conduct the search. This is because the term “northwestern” appears in certain documents absent the phrase “Northwestern University.”

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 9, 2020.

Christopher A Colbow (affiliate) Digitally signed by Christopher A Colbow (affiliate)
Date: 2020.10.09 09:28:49 -04'00'

Christopher A. Colbow, Division Chief
Bureau for Management, Office of Management
Services, Information and Records Division,
USAID

Exhibit I

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

JACQUELINE STEVENS,)
)
Plaintiff,)
)
v.) No. 18 C 5391
)
BROADCAST BOARD OF GOVERNORS,)
et al.,) Chicago, Illinois
) December 2, 2019
Defendants.) 9:30 a.m.

TRANSCRIPT OF PROCEEDINGS
BEFORE THE HONORABLE MARY M. ROWLAND

APPEARANCES:

For the Plaintiff: LAW OFFICES OF LARRY R. GLAZER
(appeared telephonically) BY: MS. NICOLETTE GLAZER
1875 Century Park East
Suite 700
Century City, California 90067
(310) 407-5353

For the Defendants: HON. JOHN R. LAUSCH, JR.
United States Attorney
BY: MR. PRASHANT KOLLURI
Assistant United States Attorney
219 South Dearborn Street
Suite 500
Chicago, Illinois 60604
(312) 353-5300

1 (Proceedings had in open court:)

2 THE CLERK: 18 C 5391, Stevens v. Broadcasting Board
3 of Governors.

4 MS. GLAZER: Good morning, your Honor. Nicolette
5 Glazer appearing on behalf of plaintiff.

6 MR. KOLLURI: Good morning, your Honor. Prashant
7 Kolluri appearing on behalf of the government.

8 THE COURT: Good morning.

9 So I know there are 29 different FOIA requests for 12
10 different agencies. Last time we talked, you were working
11 through the requests. How is it going?

12 MR. KOLLURI: Your Honor, from the government's
13 perspective -- and I had spoke to Ms. Glazer yesterday -- the
14 government's productions are complete. My understanding is
15 that Ms. Glazer and her client are working through them and
16 maybe have identified a few issues that they would like to
17 meet and confer about. And I think there are -- they're
18 trying to narrow the disputes so that we can brief a few
19 issues and kind of go from there.

20 THE COURT: Okay. What I'd like to know before we
21 start briefing, are we talking about six agencies? Two
22 agencies? 12 agencies? So when could you, Ms. Glazer, be
23 able to report to me on that?

24 MS. GLAZER: Well, your Honor, we have reviewed the
25 productions. And I understand, as counsel said, each agency

1 has said that this is the final production. Plaintiff has
2 reviewed them. There are several agencies that are very kind
3 of urgent for her for her research. So what she would like to
4 do is address the USCIS, the ICE, and I believe the FBI
5 productions. They are the most voluminous obviously. And
6 those are the ones that she has the most problems with the
7 redactions.

8 So what, your Honor, I would ask the Court is to give
9 me leave to file a motion to compel to address the
10 deficiencies in productions and the redactions in the -- those
11 agencies and those productions. Obviously, what we would like
12 to be able to do first is obviously have a detailed meet and
13 confer with counsel. Hopefully we may resolve some of it,
14 though some of them are legal issues.

15 THE COURT: Right. So how much time do you need to
16 do that?

17 MS. GLAZER: Well, your Honor, I was talking to
18 Mr. Kolluri. I was thinking maybe two weeks or three weeks,
19 considering the holidays, to meet and confer. I could file
20 the motion right after that, and then the Court can set a
21 briefing and perhaps a hearing.

22 THE COURT: Okay. So why don't I have a status -- so
23 my question is to you, counsel, particularly, I can have a
24 status the week of the 16th, and you can tell me whether a
25 motion to compel is necessary. Or I can have a status in the

1 new year. What makes sense so that I'm not wasting anybody's
2 time, particularly my own?

3 MS. GLAZER: Well, your Honor, if the Court would
4 indulge us for a status hearing in the new year, I think that
5 perhaps will be more productive.

6 THE COURT: Okay. Let's do that.

7 MS. GLAZER: People may not be in --

8 THE COURT: Let's do that.

9 MS. GLAZER: -- town to respond in the different
10 agencies that are involved.

11 THE COURT: Let's do that. Okay. First week of
12 January sound too rushed in terms of you talking to your
13 agencies?

14 MR. KOLLURI: No, your Honor. I think that should
15 work fine. That would be the week of the 6th?

16 THE COURT: Yes.

17 MR. KOLLURI: I think that should be okay.

18 THE COURT: Because I can do the week of the 13th.

19 MR. KOLLURI: Why don't we just do the week of the
20 13th to be safe because if it is multiple agency counsel --
21 I'll be here, but I don't know what other people's schedules
22 are.

23 THE COURT: Why don't we say -- Dawn, what do you
24 think, the 14th at 10:00?

25 THE CLERK: Sure.

1 THE COURT: So let's say the 14th at 10:00 o'clock.
2 And hopefully by then, you'll know whether there's any
3 disputes left and how many agencies there are.

4 MR. KOLLURI: Great.

5 THE COURT: Okay. Thanks so much.

6 MS. GLAZER: Very good. Thank you, your Honor.

7 MR. KOLLURI: Thank you.

8 THE COURT: Have a good day.

9 MR. KOLLURI: Thank you. You too, your Honor.

10 MS. GLAZER: Thank you.

11 (Which were all the proceedings heard.)

12 * * * * *

13

14 I certify that the foregoing is a correct transcript from the
15 record of proceedings in the above-entitled matter.

16 /s/ Nancy C. LaBella
17 Official Court Reporter

October 1, 2020

18

19

20

21

22

23

24

25

Exhibit J

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

JACQUELINE STEVENS,)
)
Plaintiff,)
)
v.) No. 18 C 5391
)
BROADCAST BOARD OF GOVERNORS,)
et al.,) Chicago, Illinois
) January 30, 2020
Defendant.) 9:30 a.m.

TRANSCRIPT OF PROCEEDINGS
BEFORE THE HONORABLE MARY M. ROWLAND

APPEARANCES:

For the Plaintiff: LAW OFFICES OF LARRY R. GLAZER
(appeared telephonically) BY: MS. NICOLETTE GLAZER
1875 Century Park East
Suite 700
Century City, California 90067
(310) 407-5353

For the Defendants: HON. JOHN R. LAUSCH, JR.
United States Attorney
BY: MR. PRASHANT KOLLURI
Assistant United States Attorney
219 South Dearborn Street
Suite 500
Chicago, Illinois 60604
(312) 353-5300

1 (Proceedings had in open court:)

2 THE CLERK: 18 C 5391, Stevens v. Broadcasting Board
3 of Governors.

4 MS. GLAZER: Good morning, your Honor. Nicolette
5 Glazer appearing on the telephone for plaintiff Stevens.

6 THE COURT: Good morning.

7 MR. KOLLURI: Good morning, your Honor. Prashant
8 Kolluri for the government.

9 THE COURT: Good morning.
10 How is working through the 29 FOIAs?

11 MR. KOLLURI: I think it's --

12 MS. GLAZER: Your Honor --

13 THE COURT: Why don't I hear from counsel who is in
14 the courtroom.

15 MR. KOLLURI: Sure. Your Honor, I think it is okay.
16 We've narrowed the dispute. Ms. Glazer and I talked once last
17 week and once this week. And if it's okay with the Court, I
18 think the idea is that Professor Stevens will file a motion
19 for relief to address some search adequacy objections she has,
20 as well as possible redaction issues for eight FOIA requests.
21 And then we'll take a look. And I think it's going to involve
22 about four different agencies. So we just wanted to take a
23 look at the motion and maybe set a status date shortly
24 thereafter to set a briefing schedule. Or we could just call
25 in with the briefing schedule and then get it briefed.

1 And then I had one issue that I'd like to raise
2 with -- which I mentioned with Ms. Glazer -- which is that,
3 you know, we're going to be spending time briefing eight FOIA
4 requests. There are obviously 29 FOIA requests. My
5 understanding from Ms. Glazer is they either haven't
6 identified issues in the other 21 or they've chosen not to
7 raise them. The last thing the government would want is
8 multiple rounds of briefing and, oh, well, by the way, we have
9 this --

10 THE COURT: No, we're not doing that.

11 MR. KOLLURI: Okay.

12 THE COURT: We're down to eight. So that means the
13 other 21 are resolved; is that correct?

14 MS. GLAZER: That is correct, your Honor. They're
15 either productions that are already done in those and she
16 considered them completed or the issues are not -- you know,
17 they're not clarified because we don't know what's in the
18 redactions.

19 THE COURT: So we have potential disputes on eight
20 and the other 21 are resolved. You've gotten the documents
21 that you need or you think you're entitled to or that the
22 government has?

23 MS. GLAZER: Correct.

24 THE COURT: Understood? Okay. Very good.

25 So you need to file a motion about a dispute on

1 eight. When do you want to file that?

2 MS. GLAZER: Can I have 30 days?

3 THE COURT: 30 days? Sounds good.

4 MS. GLAZER: And one other request, your Honor.

5 Considering this is very large and involved, about, I believe,
6 10,000 pages and some complex issue, would the Court be
7 willing to extend the page limit for the motion and responses
8 with extra ten pages?

9 THE COURT: Yes. Okay. So your motion is going to
10 be due on February 28th. And you want 25 pages?

11 MS. GLAZER: If I can, your Honor, yes.

12 THE COURT: That's fine. And then were you going to
13 come in before you file a response and we're going to talk?
14 Was that your proposal?

15 MR. KOLLURI: Either that, your Honor, or if we could
16 just take a look at the motion and then Ms. Glazer and I can
17 talk and then call in with a proposed briefing schedule for
18 our response and stuff.

19 THE COURT: Why don't we do that. Why don't you
20 submit a proposed briefing schedule to my in-box. What do you
21 want, like 21 days to do that so you have time to talk and
22 look it over?

23 MR. KOLLURI: That would be great.

24 THE COURT: Okay. So by March 20th submit a briefing
25 schedule and hopefully you'll get rid of some of the disputes.

1 MR. KOLLURI: If we can, yes.

2 THE COURT: Sounds beautiful. Okay. Great. I'll
3 see you later.

4 MR. KOLLURI: Thank you.

5 MS. GLAZER: Thank you, your Honor.

6 (Which were all the proceedings heard.)

7 * * * * *

8

9 I certify that the foregoing is a correct transcript from the
10 record of proceedings in the above-entitled matter.

11 /s/ Nancy C. LaBella
12 Official Court Reporter

October 1, 2020

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